

EXHIBIT BB

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

VIRGINIA COALITION FOR IMMIGRANT
RIGHTS; LEAGUE OF WOMEN VOTERS OF
VIRGINIA; LEAGUE OF WOMEN VOTERS
OF VIRGINIA EDUCATION FUND;
AFRICAN COMMUNITIES TOGETHER,

Plaintiffs,

v.

SUSAN BEALS, in her official capacity as
Virginia Commissioner of Elections; JOHN
O'BANNON, in his official capacity as
Chairman of the State Board of Elections;
ROSALYN R. DANCE, in her official capacity
as Vice-Chairman of the State Board of
Elections; GEORGIA ALVIS-LONG, in her
official capacity as Secretary of the State Board
of Elections; DONALD W. MERRICKS and
MATTHEW WEINSTEIN, in their official
capacities as members of the State Board of
Elections; and JASON MIYARES, in his
official capacity as Virginia Attorney General,

Defendants.

Case No. 1:24-cv-01778 (Lead)
Case No. 1:24-cv-01807
Judge Patricia Tolliver Giles

SUPPLEMENTAL DECLARATION OF GIGI TRAORE

Pursuant to 28 U.S.C. § 1746, I, Gigi Traore, declare as follows:

1. I am the National Civic Engagement Director for African Communities Together (“ACT”), a 501(c)(3) nonprofit corporation with its principal place of business located in New York City, New York.

2. I submitted a Declaration in support of Plaintiffs' Motion for Preliminary Injunction. I am submitting this supplement to detail new information that ACT has acquired and new activities ACT has undertaken since I filed my first declaration.
3. ACT has learned of at least three individual members who have had their voter registration canceled since Executive Order 35 was issued on August 7, 2024.
4. ACT staff and volunteers have reached out to all three individuals. It is my understanding and belief that all of three individuals are United States citizens and eligible voters. Due to the expedited nature of this litigation, we have been unable to secure declarations directly from these impacted members.
5. ACT staff and volunteers have engaged in substantial efforts to contact individuals who have been removed via the Purge Program, especially among African immigrant communities. Our efforts to contact improperly removed voters are ongoing and substantially aided by recent acquisition of the lists of voters removed under the Purge Program.
6. To date we have identified eleven individuals, in addition to the three ACT members discussed above, who have been improperly removed from the vote rolls. It is my understanding and belief that all eleven individuals are United States citizens and eligible voters. Many of these individuals have been registered for years and are frequent voters.
7. It is my understanding and belief that some of the removed voters are naturalized U.S. citizens.
8. Many of the removed voters ACT has contacted did not realize there was any problem with their registration until they were contacted by ACT volunteers.

9. Some of these individuals have been able to re-register and cast a ballot. Others have represented to ACT volunteers that they intend to re-register and vote during early voting or on Election Day.

Executed this 23th day of October, 2024, in Washington, D.C.



Gigi Traore
National Civic Engagement Director
African Communities Together